# LOCAL BANKRUPTCY FORM 5071-1 THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (Harrisburg)

IN RE:

RANDALL SCOTT MCKILLOP : BK. No. 1:17-bk-00749-RNO

LISA MARIE MCKILLOP :

Debtors : Chapter No. 13

:

WELLS FARGO BANK, N.A. : 11 U.S.C. §362

Movant :

Name of Proceeding: MOTION FOR

RANDALL SCOTT MCKILLOP : RELIEF FROM THE AUTOMATIC

LISA MARIE MCKILLOP : STAY

Respondents

Document # 48

### REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance:

### Parties are trying to resolve the matter and request to continue to January 25, 2018

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

**Dated:** 

**December 19, 2017** 

/s/ Thomas Song, Esquire

Thomas Song, Esq., Id. No. 89834 Phelan Hallinan Diamond & Jones, LLP

1617 JFK Boulevard, Suite 1400 Philadelphia, PA 19103

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### **CERTIFICATION OF SERVICE**

#### TO THE BANKRUPTCY COURT CLERK:

Service upon the following persons was made by sending a true and correct copy of the Request to

Continue Hearing/Trial with Concurrence by first class mail or electronic means on the date listed below.

CHARLES J DEHART, III, ESQUIRE (TRUSTEE)
8125 ADAMS DRIVE, SUITE A
HUMMELSTOWN, PA 17036
LISA MARIE MCKILLOP
548 SWEETWATER DRIVE
PALMYRA, PA 17078

KARA KATHERINE GENDRON, ESQUIRE
125 STATE STREET
HARRISBURG, PA 17101
RANDALL SCOTT MCKILLOP
548 SWEETWATER DRIVE
PALMYRA, PA 17078

UNITED STATES TRUSTEE 228 WALNUT STREET, SUITE 1190 HARRISBURG, PA 17101

DATE: December 19, 2017

/s/ Thomas Song, Esquire

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